

National Park Service
US Department of the Interior

Concession Environmental Management Program
Denver, Colorado



Understanding the National Park Service's Integrated Pest Management Program





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UPDATED: March 2003

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For more information, contact the Concession Environmental Management Program:



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Purpose of This Guidance

This document provides an overview of the National Park Service's (NPS) Integrated Pest Management (IPM) Program, as outlined in the NPS-77 Natural Resources Management Guideline, and corresponding concessioner requirements under this Program.

Who Should Read This Guidance

This guidance was written for NPS concessioners who may need to control pests (e.g., insects, rodents, weeds, mold) on their property or in their buildings. (Pests are “a population of organisms that interferes with the purposes of the park.”) While this guidance was written specifically for educating concessioners on NPS procedures for managing pests, it focuses on procedures and requirements governing pest management procedures and pesticide use in national parks.

Who Needs an Integrated Pest Management (IPM) Program?

IPM is a decision-making process that coordinates knowledge of pest biology, the environment, and available technology. An IPM Program helps prevent unacceptable levels of pest damage by identifying cost-effective methods or strategies that pose the least possible risk to people, resources, and the environment. Through proper decision making, the IPM process ensures that effective, low-risk management strategies are adopted and implemented to manage pests.

Current NPS policy (NPS-77 Natural Resources Management Guideline) and soon-to-be-released NPS policy (Director's Order 77) requires that each park develop and implement an IPM Program. Concessioners are required to comply with this policy. This means that whenever a concessioner has or anticipates having a pest problem, the concessioner should consult the park IPM coordinator¹ to identify acceptable pest management procedures and strategies and ensure compliance with the park IPM Program. Proposed pesticide use must be reviewed and approved before being purchased and/or used on NPS property.

As stated in the Federal Register, July 19, 2000, Standard Concession Contract language states that “The Concessioner shall be responsible for managing weeds, and through an integrated pest management program, harmful insects, rats, mice and other pests on Concession Facilities assigned to the Concessioner . . . All such weed and pest management activities shall be in accordance with Applicable Laws and guidelines established by the Director.”

¹ Some parks may not have a park IPM coordinator. If this is the case, the concessioner should coordinate with the park to identify an individual (e.g., Park Superintendent, Park Concession Specialist) that will carry out the tasks of a park IPM coordinator as they relate to concessioner pest management activities in this document.

A park may request concessioners to prepare their own documented IPM Program that outlines procedures on how the concessioner will address specific pests. This requirement may be specified in the Concession Contract, Operating Plan, or Maintenance Plan. Technical assistance in preparing an IPM Program is available from Regional and Washington Office IPM coordinators, and from the NPS Biological Resources Management Division Integrated Pest Management Program (see **Appendix C**).

What is Included in an IPM Program?

Communicating with the Park IPM Coordinator	<p>For concessioners, the most important part of developing and implementing an IPM Program is routine consultation with the park IPM coordinator. The park IPM coordinator will help identify procedures and strategies for pest management including determining the type, source, and severity of the pest problem and recommended treatment methods. Treatment may involve nonchemical or chemical options, ongoing monitoring, and evaluations. The park IPM coordinator may also consult with public health and technical subject matter experts on pest management issues.</p> <p>The first point of contact for concessioners should be the park IPM coordinator. If additional assistance is needed, concessioners may also contact regional and Washington Area Support Office (WASO) IPM coordinators. These park, regional, and WASO IPM coordinators are specifically trained in IPM procedures and hold valid state pesticide applicator licenses.</p>
Pesticide or Biocontrol Requests	<p>In parks, preference is given to using effective, low-risk methods to control or prevent pest invasions. Nonchemical methods are preferred. These include the use of disease resistant plants, structural modifications, steam cleaning, and improved storage procedures. Chemical methods and release of biocontrol agents may be incorporated into the concessioner's IPM program if after consultation with the IPM coordinator, it is determined they are necessary.</p> <p>All proposed chemical pesticides must first be reviewed and approved by the park IPM coordinator. This includes methods and chemicals that a pest management contractor hired by the concessioner will use. A concessioner must submit information on chemical pesticides (such as pesticide labels and material safety data sheets) that it anticipates it will use during a calendar year prior to that new calendar year, or during the year as unanticipated pest issues arise. The concessioner should submit this information using</p>

the sample **Pesticide Request Form (Appendix A)** or a comparable document. Nonchemical pest management methods should also be discussed with the park IPM coordinator, although formal requests are not required.

Once the park IPM coordinator receives a request from a concessioner to use a chemical pesticide, and it is determined that chemicals (i.e., pesticides) are needed to prevent or suppress a pest problem, the park IPM coordinator is required to obtain prior approval for their use from the regional IPM coordinator through the NPS Pesticide Use Proposal System (PUPS). Each pesticide use request is reviewed on a case-by-case basis. For certain pesticides (i.e., application to water, where use may affect threatened and endangered species, restricted use pesticides, aerial application, and application over 200 contiguous acres), the approval process is elevated to the Washington Area Support Office (WASO) IPM coordinator. Urgent pesticide requests can be reviewed via phone by the Regional or WASO IPM coordinator in emergencies. These requests are entered into the PUPS database afterwards by the park IPM coordinator.

After the park IPM coordinator obtains approval for use of a particular pesticide, the concessioner is notified if the proposed chemical pest management method is approved. That pesticide can then be used within the park for a specific project up until the last day of the calendar year.

NOTE:

If the concessioner uses private or commercial pest management companies for pest management services, the concessioner must ensure that the contract with each company clearly specifies what pest management methods can be used on NPS lands and that pesticide use must be reviewed and approved prior to use. The concessioner is responsible for monitoring its private or commercial pest management companies to ensure pest management methods are in compliance with the park IPM program.

The concessioner is also responsible for obtaining an annual pesticide use log from its applicators and providing this information to the park IPM coordinator at the end of each calendar year. The park IPM coordinator will then incorporate it into the PUPS database.

Purchasing	When purchasing approved pesticides, concessioners should only purchase the amount authorized for use during the year of approval. The exception to this rule is when the smallest amount available for purchase is a greater than the amount authorized for use during the year.
Use	<p>Concessioners and any private or commercial pest management companies used by concessioners are responsible for complying with state pesticide laws and regulations regarding pesticide application. Applicators are individually responsible and liable for pesticide application. Applicators are also required to have pesticide certifications and/or licenses as required by individual state regulations.</p> <p>All pesticides have instructions on how they should be used, such as safety equipment that must be worn, and pesticide application guidelines. Concessioners must not deviate from these directions since they are legally binding.</p> <p>If park approval is obtained to apply restricted use pesticides (as defined by the US Environmental Protection Agency), a concessioner must ensure that it has a certified commercial applicator to apply these chemicals on NPS property.</p>
Storage	<p>If concessioner pesticide storage facilities are located on NPS property, the facilities must be managed in accordance with OSHA regulations (e.g., facilities must be locked, fireproof, ventilated, and have proper warning signs). Pesticides must be stored separately from other substances (e.g., food, cleaning chemicals).</p> <p>In addition, pesticides should be stored in a building separate from other chemicals. This will help avoid the potential reaction of incompatible materials (e.g. flammable dormant oil and reactive organic insecticide) or other adverse reactions (e.g., herbicides should be stored separately away from other pesticides as they can off-gas and chemically alter other pesticides).</p>
Disposal	By limiting the amount of pesticides purchased, there should be few, if any, pesticides that need to be disposed. If excess chemical pesticides are found, concessioners should attempt to use those chemicals as intended until the pesticides are used up. If it is determined that leftover pesticides are unusable, they must be discarded according to label instructions and in compliance with OSHA hazardous material regulations. There may be an opportunity to dispose of pesticides as a universal waste, which is subject to less stringent regulations (see “Additional Information”).

Annual Reporting	<p>Concessioners are required to keep an annual pesticide use log and submit it to the park IPM coordinator at the end of the calendar year. This pesticide use log should include all pesticides, both approved and unauthorized use, applied by concessioner staff and private or commercial pest management companies. The pesticide use log should be maintained on a project-by-project basis. (For example, if project number "PARK-01-2003" for boric acid is approved for use in calendar year 2003 for crack and crevice treatment of cockroaches in the dining area, all use for this specific project should be tallied under this same project number.)</p> <p>The park IPM coordinator will include the concessioner's pesticide use in the parkwide pesticide use log and submit it to the PUPS database. This information is maintained for legal purposes and in accordance with NPS Management Policies.</p>
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Exceptions: The following pesticides are exempted from the IPM Program (i.e., do not require prior review or approval before purchase or use):

- **Personal insect repellants** and bear deterrents if purchased with personal funds and applied to employees' own persons, pets, and privately owned livestock.
- **Disinfectants** and cleaning solutions used in restrooms and restaurants.

Additional Information

Resource Type	Name	Description	Source
phone number	NPS Biological Resources Management Division Integrated Pest Management Program	Provides technical assistance on IPM.	Carol DiSalvo 202/513-7183
phone number	NPS IPM Coordinators	Listing of all NPS IPM coordinator and contact information.	See Appendix C of this document
website	The National Park Service Integrated Pest Management Manual	Provides a description of the biology and management of 21 species or categories of pests.	NPS www.nature.nps.gov/wv/ipm/manual.htm
website	IPM Management in the National Park Service	A basic fact sheet on the IPM in the National Park Service	NPS www.nature.nps.gov/facts/fipm.htm
website	NPS Director's Order 77-7, Section on Integrated Pest Management	Information on the NPS IPM.	NPS www2.nature.nps.gov/nps77/ipm.new.html

Resource Type	Name	Description	Source
document	EnviroFacts Sheet: Waste Pesticide Management	Two-page document used by parks and concessioners to understand environmental issues.	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913
document	EnviroCheck Sheet: Pesticide Management	Multi-page document used as a tool during NPS environmental audits.	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913
document	Guidance for Managing Universal Waste	Guidance for understanding the Universal Waste Rule. Some hazardous wastes, called universal wastes (i.e., fluorescent bulbs, pesticides, mercury thermostats, some batteries), are subject to less stringent regulatory standards.	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913



Appendix A: Sample Pesticide Request Form

Background: This sample Pesticide Request Form may be used by concessioners to compile a list of pesticides that will be used over a calendar year.

PESTICIDE REQUEST FORM
TO BE SUBMITTED TO THE PARK IPM COORDINATOR
FOR THE CALENDAR YEAR OF 20____

Pesticide Name	Proposed Amount Used	Proposed Location Used	Pest Targeted	Notes	Approved (Y/N)



Appendix B: Sample Pesticide Use Log

Background: This Pesticide Use Log may be used by concessioners to track the type and amount of pesticides used during a calendar year. The pests targeted, and type, amount, and location of pesticides used during the calendar year must be submitted to the park IPM coordinator at least annually.

This sample Log provides space to track other information such as the date on which pesticides were applied, who applied the pesticides, and whether the method or strategy was successful. Similar forms may also be obtained from each state's respective Pesticide Board.

PESTICIDE USE LOG

FOR THE CALENDAR YEAR OF 20__

[illegible]



Appendix C: National Park Service IPM Coordinators

Background: The first point of contact for concessioners with questions about pest management should be the park IPM coordinator. If additional assistance is needed, concessioners may also contact the regional and WASO IPM coordinators identified on the next page.

REGIONAL OFFICES

ALASKA Pat Owen
Denali National Park
P.O. Box 9
McKinley Park, AK 99755
907-683-9547
Fax 907-683-9639

**MIDWEST
REGION** Mike Gallagher
National Park Service
1709 Jackson St.
Omaha, NE 68102
402-221-3418
Fax 402-221-3480

**NATIONAL
CAPITAL
REGION** Jil Swearingen
Center For Urban Ecology
National Park Service
4598 MacArthur Blvd., NW
Washington, DC 20007
202-342-1443X218
Fax 202-282-1031
www.nps.gov/plants/alien

**NORTHEAST
REGION** Wayne Millington
209a Ferguson Building
University Park, PA 16802
814-863-8352
Fax 814-865-1649
npspests.cas.psu.edu/orl

**SOUTHEAST
REGIONAL
OFFICE** Chris Furqueron
National Park Service
1924 Building
100 Alabama St., SW
Atlanta, GA 30303
404-562-3113x540

CLUSTERS

**COLORADO
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WASHINGTON AREA SUPPORT OFFICE

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